

EXHIBIT A
EXPERT DISCLOSURE LETTER OF
JUNE 30, 2014



U.S. Department of Justice

Carmen M. Ortiz
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District of Massachusetts

Main Reception: (617) 748-3100

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June 30, 2014

BY ELECTRONIC AND REGULAR MAIL

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Federal Defender's Office
51 Sleeper Street, 5th Floor
Boston, MA 02210

Re: United States v. Dzhokhar Tsarnaev, Crim. No. 13-10200- GAO

Dear Counsel:

We are writing to provide our first set of expert disclosures in this matter. Accompanying this letter, please find a DVD (Bates # 0062398) containing:

- 1) A searchable Excel index describing, among other things, the final forensic lab reports, the forensic disciplines, the names of the examiners, curricula vitae (CV) where available, a description of each examiner's report, and for convenience, a link including their report. The index provides a summary of the opinion of each expert witness. The final forensic lab reports provide the bases and reasons for each witness's opinions, and the curricula vitae provide a summary of the witness's qualifications.
- 2) Folders containing final lab reports, lab protocols and curricula vitae, that correspond with the index organized by folder.

We are also preparing of Blu-ray and DVD discs containing the underlying notes and other supporting materials for these lab reports, including in some cases, early Jencks material. Because of the volume of this data, we anticipate producing these supporting materials in the next day or two. Given the highly sensitive personal identifying information and investigative

information included in the materials, all of the expert disclosure information should be considered sensitive under the protective order.

The accompanying materials describe forensic examinations conducted by the FBI laboratory as well as the Massachusetts State Police laboratory. At this time, we are providing notice of experts in all of these disciplines, subject to revision as we approach trial. Each of the examiners listed in the attached spreadsheet is qualified as an expert in their respective forensic discipline. They are each expected to testify to their examinations and comparisons consistently with their reports.

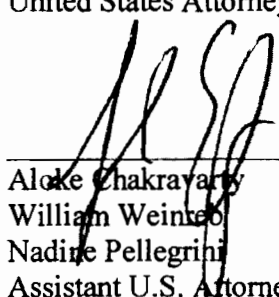
We expect to also call the Medical Examiners who performed the autopsies on the deceased victims. We have previously provided the autopsy reports and will provide you with their CVs when received.

We have provided you at this point with the expert notice and disclosure required by the Court. It is possible that some lab reports have not yet been created or received. We will supplement these disclosures as necessary. In addition, we intend to make additional expert disclosures related to other subject matters as per the Court's scheduling order.

Sincerely,

CARMEN M. ORTIZ
United States Attorney

By:



Alok Chakravarty
William Weintrob
Nadine Pellegrini
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